

BR

JAMES M. WORTHEN  
plaintiff

**FILED**  
SEP 8 2008  
MB

NO: 07-C-6687

-vs-

\* HARRY D. LEINENWEBER  
\* HONORABLE JUDGE

DR. TING et al.  
defendants

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**\*\*\* MOTION FOR INVESTIGATOR SERVICES \*\*\***

NOW COMES THE PLAINTIFF, JAMES MICHAEL WORTHEN, PRO-SE AND RESPECTIVELY MOVES THIS MOST HONORABLE COURT TO GRANT THIS MOTION AND CONSIDER THE PLAINTIFF(S) REASONS LISTED BELOW OF THE IMPORTANCE OF WHY THIS REQUEST SHOULD BE GRANTED SO THAT THE LAWS OF JUSTICE CAN WORK FOR BOTH SIDES...PER FED. R. of CIV. PRO. 34(a) and 26(b)

- 1) THE PLAINTIFF WOULD PLEASE, ASK or REQUEST THAT THE COURT HAVE THE INVESTIGATOR OR A STENOGRAPHER TAKE THE STATEMENTS FROM THE COOK COUNTY OFFICER MS. SANDOVAL 7-3 SHIFT AS MY WITNESS THAT ON 11/29/07 at approx 2:00 p.m. I WAS BROUGHT BACK FROM THE CERMAK HOSPITAL WITH A SIGNED PRESCRIPTION BY DR. TING FOR A NEW CLOTHING CHANGE & BEDDING CHANGE SO AS TO FIND OUT THE SEVERE AND MOST IRRITATING RED SPOTS THAT COVERED MY BODY, BUT WHEN I GAVE THIS PARTICULAR PRESCRIPTION TO c/o SANDOVAL, SHE IMMEDIATELY WALKED ACROSS TO THE SECURITY CENTER OFFICE WITHIN MY CLEAR VIEW & I PERSONALLY SEEN HER HAND THE PRESCRIPTION TO 'CHIEF WRIGHT' AND HE LOOKED AT THE DR. ORDER & THREW IT IN THE GARBAGE...
- 2) I WAS THEN TAKEN BACK TO THE DR. TING BECAUSE THE SPOTS WERE GETTING WORSE & SPREADING MORE, ONCE I WAS IN THE PRESENCE OF DR. TING I TOLD HIM THAT THE PRESCRIPTION THAT HE ISSUED ME THE WEEK BEFORE WAS DENIED & THROWN IN THE GARBAGE BY CHIEF WRIGHT AND THE DR. ISSUED ME ANOTHER PRESCRIPTION FOR THE SAME BEDDING SHEET & CLOTHING CHANGE & I TRIED TO GIVE IT TO SEVERAL c/os BUT TO NO AVAIL, SO I PERSONALLY CONFRONTED MR. WRIGHT AND TRIED TO EXPLAIN TO HIM THAT THE RED SPOTS ON MY BODY ARE SEVERE AND THAT THE LIVING WING & SHOWERS ARE EXTREMELY FILTHY AND I THEN ATTEMPTED TO HAND HIM THE SECOND PRESCRIPTION BY THE DR. AND HE REFUSED TO ACCEPT THAT PRESCRIPTION AND I WAS AGAIN DENIED THE MEDICAL TREATMENT THAT THE DR. PRESCRIBED BY THIS CHIEF OF SECURITY MR. WRIGHT & OTHER COUNTY OFFICERS. I NEVER DID RECEIVE THE CHANGE OF BEDDING OR CLOTHING FOR THOSE 2 PRESCRIPTIONS THAT ARE ATTACHED TO THIS MOTION.
- 3) **THE PLAINTIFF**, ALSO REQUESTS THAT THE OFFICERS WRITTEN LOG BOOK BE COPIED FROM 11/13/07 THROUGH 12/10/07 SO AS TO SHED ALOT OF TRUTH IN MY HONEST ALLEGATIONS THAT PERTAINS TO THIS PARTICULAR CASE, AS EACH SHIFT OFFICER HAS & DID LOG IN SPECIFIC TIMES, DATES OF ISSUES AND OF ANY DETAINEE MOVEMENTS AND BY WHOM.
- 3) I AM ALSO REQUESTING THAT c/o HERRERA 3-11 SHIFT BE QUESTIONED & sgt. STRONER OF WHOM AUTHORIZED c/o HERRERA TO TAKE ME TO THE RECEIVING HEALTHCARE IN DIV. 5 WHERE THE PARAMEDIC MS. DOUGLAS VIEWED THE SERIOUS RED UNKNOWN OUTBREAK UPON MY BODY AND SHE CLAIMS THAT SHE ORDERED MR. c/o HERRERA TO TAKE ME IMMEDIATELY TO THE HOSPITAL AT CERMAK BUT INSTEAD I WAS TAKEN BACK UP TO 1-D- DIV. 5 AND MADE TO LOCK BACK UP IN MY CELL... I THEN SEEN MS. DOUGLAS A FEW DAYS LATER AND TOLD HER THAT THE SPOTS ARE STILL GETTING WORSE & THAT I DON'T FEEL GOOD & SHE SAID THAT SHE ORDERED MR. HERRERA TO TAKE ME TO CERMAK ON THAT LAST VISIT WITH HER BUT MR. HERRERA STATES THAT MS. DOUGLAS MADE NO SUCH ORDER OR AUTHORIZATION AND MR. HERRERA LOGGED THIS IN THE LOG BOOK IN QUESTION...
- 4) I'M ALSO ASKING THAT MR. GARY HICKERSON / SUPT. OF DIVISION 5 & THE c/o WITNESS OF WHOM WAS PRESENT ON OR ABOUT 11/19/07 AT approx 5:00p.m. WHEN I PERSONALLY VIEWED MR. HICKERSON IN THE HALLWAY & FLAGGED HIM DOWN SO AS FOR HIM TO SPEEK TO ME PERSONALLY AND WE DID CONVERSE, I DID SHOW HIM MY CHEST AREA AND ALSO c/o CHICO WAS PRESENT & MR. HICKERSON ASKED ME IF I EVER HAD SHINGLES? I STATED THAT I DID NOT KNOW WHAT THAT WAS AND THAT I HAVE NEVER HAD A DISEASE OR ANYTHING LIKE THIS WRONG WITH MY BODY & MR. HICKERSON ASSURED MR THAT I WOULD BE TAKEN TO THE HEALTHCARE, FIRST THING IN THE MORNING, BUT THAT WAS NOT TRUE CAUSE MR. HICKERSON DENIED ME THE DUE MEDICAL ATTENTION THAT I DESERVED... THE GRIEVANCE RECORDS WILL SHOW THAT I WAS IN A CONSTANT BATTLE TO KEEP THE WING & SHOWER AREAS CLEAN & GERM FREE BUT THE LIVING CONDITIONS AT THE COOK COUNTY JAIL & THE WING I WAS ON WAS BEYOND GROSS & FILTHY & WE WERE DENIED BASIC CLEANING SUPPLIES BUT IT WAS MY GRIEVANCES THAT FORCED C.C.J. OFFICIALS HANDS...

- 5) THE FOLLOWING IS THE NAMES OF ALL PERSONS OF WHOM SHOULD BE DEPOSED OR THEIR STATEMENTS TAKEN UNDER OATH OF PENALTIES OF PERJURY... DR. TING, DR. CARASQUILLO, PARAMEDIC MS.DOUGLAS, SUPT. MR. GARY HICKERSON, CHIEF OF SECURITY MR. WRIGHT, c/o FUNCHES 7-3 SHIFT DIV. 5, c/o CHICO 3-11 SHIFT DIV. 5, C/O MERRERA 3-11 SHIFT DIV.5, c/o MS.SANDOVAL 7-3 SHIFT DIV.5, AND THEN THE LOG BOOK ITSELF THAT WAS ON THE WING OF 1-D DIVISION 5 AT WHICH SPECIFIC ENTRIES WERE MADE BY VARIOUS COOK COUNTY OFFICERS THAT CONCERNS THE TRUTH ON THIS MATTER, I WOULD PLEASE ASK THE HONORABLE COURT TO OBTAIN COPIES OF THAT LOG BOOK THAT ONLY PERTAINS TO THIS MERITORIAL CLAIM... THANK YOU VERY MUCH...
- 6) THE PLAINTIFF ALSO REQUESTS THAT ANY AND ALL TANGIBLE ITEMS, HOSPITAL REPORTS, PAPERS OR ANY PERTINANT INFORMATION THAT HAS BEEN OBTAINED BY THE ATTORNEY FOR THE DEFENDANTS BE SHARED AS PART OF OR ALL DISCOVERY UNDER RULE 26 OF THE FED. R. of CIV. P.

WHEREFORE, THE PLAINTIFF, JAMES M. WORTHEM, PRAYS THAT THIS HONORABLE COURT GRANT THIS MOTION SO AS TO HAVE AN EQUALITY FOR BOTH SIDES, THE PLAINTIFF IS WITHOUT THE FUNDS OR ATTORNEY RESOURCES OR TOOLS TO OBTAIN THE STATEMENTS FROM SAID PARTIES TO THIS CASE AND I AM SENDING A LEGAL LEDGER AS TO MY CURRENT & PAST MONETARY ACCOUNT AS PROOF OF MY INDIGENCY.. THANK YOU FOR YOUR TIME AND PATIENCE...

\*\*\* CERTIFICATE OF SERVICE \*\*\*

I, JAMES M. WORTHEM, PLAINTIFF, PRO-SE, HEREBY CERTIFY THAT ON 8/28/08, I CAUSED THE MOTION FOR INVESTIGATOR SERVICES TO BE SERVED ON THE ASSISTANT STATES ATTORNEY MR. MICHAEL L. GALLAGHER, OF WHOM IS REPRESENTING THE DEFENDANTS ON THIS CASE, BY FILING THE SAME BEFORE THE HONORABLE COURT, BY HANDING SUCH ENVELOPE(s) TO AN I.D.O.C. OFFICER AT THE ILLINOIS RIVER C.C. IN CANTON ILLINOIS TO BE DEPOSITED IN THE U.S. POSTAL SERVICE AT THIS FACILITY AT ABOUT 8:00p.m. WITH PROPER POSTAGE PRE-PAID...

/s/ JAMES MICHAEL WORTHEM

/s/ James Worthem

**Checkoff!**

## Patient

SCOTT DAVIS

**Patient Copy**

ID#

07-007190-5

Date 2/4

### Problem

**Location**

**Weight**

Date of Birth

**Order (Physician's Signature after last order)**

## Allergy

1

# FX

②  $\text{heat of } 2.5g = R \cdot \Delta T + 2W$

2) ZAMPAC 180 + B.D. + 2000

change cloth bed sheet

**FOR INFORMATION ONLY - DO NOT DISPENSE**

DEA / Illinois Lic.#

Physician \*\* PRINT

Time

Form 853.01

Med/Surg [

MHS

This one was Given to  
Yo Cunningham on 12/5/07 - 7-3 shift  
At 8:30 a.m. Given back to me,  
stating he couldn't Do any  
Thing about it!

12/5/07 at approx 8:30 AM  
on 1-0-6, 113  
c/o Funkettes



Patient Copy

Checked

Patient

James Worthem  
SCOTT DAVID

ID#

070071505

Date

11/29/07

2

BAC

Problem

Location

Weight

Date of Birth

Order (Physician's Signature after last order)

Allergy:

9/1/72

Filed



chang cloth  
chang bedsheet

Gave to 90  
Sandora/who  
Gave to chief  
wright

11/29/07

PR. Ting

Data Entry

FOR INFORMATION ONLY - DO NOT DISPENSE

DEA / Illinois Lic.#

Physician \*\* PRINT

Time:

Form 853.01

Med/Surg [ ]

MHS [ ]

This is the copy from when I took it  
through the green one in garbage after crumbling  
it on 11/29/07 in front of C/O Sandoval and she  
will testify to its truth.